Representation - Draft Modification Report UNC 0698S Improvements to Margins Notice Arrangements

Responses invited by: 5pm on 08 August 2019

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Gerry Hoggan
Organisation:	Scottish Power
Date of Representation:	8 August 2019
Support or oppose implementation?	Support
Relevant Objective:	a) Positiveb) Positivec) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We consider that improved information provision, coupled with earlier notifications and a more accurate assessment of the overall supply/demand position, should allow markets to respond to circumstances in a more efficient, effective and proportionate manner.

Self-Governance Statement: Please provide your views on the self-governance statement.

We agree that the proposal meets the relevant self-governance criteria

Implementation: What lead-time do you wish to see prior to implementation and why?

Implementation by 1st October 2019 would be desirable so that the improved arrangements are in place ahead of the coming winter 2019/20.

Impacts and Costs: What analysis, development and ongoing costs would you face?

None anticipated

Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

We are comfortable that the Legal Text will deliver the intent of the Solution.

Joint Office of Gas Transporters

Are there any errors or omissions in this Modification Report that you think should be taken into account? Include details of any impacts/costs to your organisation that are directly related to this.

None that have been identified

Please provide below any additional analysis or information to support your representation

None